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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

9 SONNY GUBBINE,) Case No. 2:21-cv-02078-JAD-EJY
10 Plaintiff,)
11 v.) **STIPULATION AND ORDER TO**
12 HOLDER CONSTRUCTION GROUP,) **EXTEND SCHEDULING**
13 LLC, a Georgia Limited Liability Company;) **ORDER DEADLINES**
14 TEG STAFFING, INC. d/b/a EASTRIDGE) **(Eighth Request)**
15 WORKFORCE SOLUTIONS, a California)
Corporation; DOES I-X; ROE BUSINESS)
ENTITIES I-X,)
16 Defendants.)
17 _____)

18 The parties, by and through their respective counsel, hereby stipulate to extend
19 the Scheduling Order deadlines in this case as follows:

20	Discovery Deadline	January 19, 2024
21	Dispositive Motion Deadline	February 19, 2024
22	Joint Pretrial Order	March 20, 2024, or 30 days from the ruling on a dispositive motion

24 This is the eighth request for an extension of these deadlines. The parties
25 provide the following information about the proposed discovery deadline extension.

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Discovery Completed to Date

The parties have served their Initial Disclosures and supplements thereto. Defendant has served interrogatories and a request for production and Plaintiff has responded. Defendant has subpoenaed and received documents from TEG Staffing and several medical care providers. Plaintiff subpoenaed additional documents from TEG. Plaintiff has been deposed. Victor Aldana of TEG has been deposed. A Rule 30(b)(6) deposition for TEG has occurred. A Rule 30(b)(6) deposition of Defendant is currently scheduled for December 5, 2023.

Remaining Discovery to Be Completed

10 The completion of the Rule 30(b)(6) deposition of Defendant, and the
11 depositions of James McCain, David Meeh and Dave Enzor, as well as possible further
12 written discovery.

Reasons Discovery Could Not Be Completed Within the Existing Deadline

14 Defense counsel is still on a reduced work schedule due to medical issues. The
15 three individuals mentioned above are being subpoenaed for the week of December 19,
16 2023, efforts to secure their voluntary appearance thus far being unsuccessful. A
17 discovery extension to January 19, 2024 is sought in case there are any issues with
18 service of process or the deponents have scheduling issues.

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Proposed Dates for Completion of Discovery

The parties believe they will be able to complete discovery by the proposed new date of January 19, 2024.

KEMP & KEMP

FISHER & PHILLIPS LLP

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IT IS SO ORDERED:

Elayne J. Zouchah
U.S. MAGISTRATE JUDGE

Dated: November 22, 2023

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Las Vegas, Nevada 89101